

JEFFREY W. TAM  
408 Yorkshire Road  
Alameda, CA 94501  
(510) 522-5534

Plaintiff, *Pro Se*

JOSEPH P. RUSSONIELLO (CSBN 44332)  
United States Attorney  
JOANN M. SWANSON (CSBN 88143)  
Chief, Civil Division  
JENNIFER S WANG (CSBN 233155)  
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-6967  
Facsimile: (415) 436-6748  
jennifer.s.wang@usdoj.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

JEFFREY W. TAM,

Plaintiff,

v.

JOHN E. POTTER,

Defendant.

No. 07-2747 SI

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DEADLINES  
FOR EXPERT DISCOVERY**

The parties stipulate as follows:

1. On March 18, 2008, the Court granted plaintiff permission to file a Second Amended Complaint to allege that defendant has “created mental stress for the plaintiff.”

2. Pursuant to the Court’s September 10, 2007 Case Management Order, the deadline for designation of experts is currently set for May 1, 2008. The expert discovery cut-off is May 30, 2008.

3. Plaintiff has agreed to an independent psychological examination, and the parties are currently in the process of finding a mutually convenient date for the examination. To allow time for the parties to find a convenient date for the examination and time for the completion of a report following the examination, the parties respectfully stipulate to extend the expert discovery deadlines as follows:

Expert Disclosure: May 21, 2008

Expert Discovery Cut-Off: June 30, 2008

IT IS SO STIPULATED.

DATED: March 27, 2008

Respectfully submitted,

/s/  
JEFFREY W. TAM  
Plaintiff, *Pro Se*

DATED: March 31, 2008

JOSEPH P. RUSSONIELLO  
United States Attorney

/s/  
JENNIFER S WANG  
Assistant United States Attorney

**[PROPOSED] ORDER**

Pursuant to the parties' stipulation, and good cause having been shown, it is ordered that:

1. The deadline for expert disclosures is extended to May 21, 2008;
2. All discovery from experts must be completed by June 30, 2008.

DATED: \_\_\_\_\_

SUSAN ILLSTON  
United States District Court Judge